

Case No. 05-0767

system of Tri-County. In February 1999, Affiant was appointed Director of Engineering for Tri-County with responsibility for all engineering functions including SCADA, AMR, work plans, budgets and electrical system performance. Affiant continues to serve as Director of Engineering for Tri-County.

3. As a part of Affiant's duties as Director of Engineering, Affiant was contacted by Clyde Finch, Production Engineer of Citation, on or about February 18, 2005 during which contact Clyde Finch requested electric service from Tri-County for Citation's gas plant which is the subject of the dispute in this docket. Clyde Finch advised Affiant that the gas plant would need a 1,500 KW transformer with delivery voltage of 277/470 volts.

4. Thereafter, on July 5, 2005, Affiant attended a meeting at Tri-County headquarters attended by Marcia Scott, General Manager; Bradley Grubb, Project Engineer; and Affiant, all of Tri-County, and with Jeff Lewis, Area Production Engineer and Edward J. Pearson, Production Engineer, both of Citation, and Todd Masten, Ameren Regulatory Specialist, and Michael Tatlock, AmerenIP District Engineer. At that meeting, both Todd Masten and Michael Tatlock of IP concurred that the Citation gas plant was in Tri-County's service territory and Tri-County was authorized to provide the electric service to the gas plant.

5. Tri-County's Salem substation and three phase line feeding from the Salem substation and situated adjacent to the Citation gas plant are adequate to provide the electrical requirements for the gas plant and the seven Citation gas compressor sites located in Tri County's service territory.

6. Tri-County's estimated cost of extending electric service to the gas plant is \$28,051.00 as shown on the Tri-County Electric Cooperative, Inc. Work Order Estimated Cost Report

attached to Affiant's Affidavit as Exhibit 1.

7. Affiant further visually inspected the 12470 volt Citation distribution line from the point where it connects to the IP Texas substation to the new service connection point at the Citation gas plant. Based upon Affiant's inspection of the "Citation" map attached to the Affidavit of Marcia K. Scott as Exhibit 6 and a copy of which is attached to Affiant's Affidavit, Citation rebuilt 1161 feet of No. 4 CU three phase line to 2/O ACSR three phase line and constructed 4119 feet of 2/O ACSR three phase line together with approximately 210 feet of underground three phase facilities and provided a three phase pad mounted transformer and associated accessories at the gas plant in order to provide adequate service to the Citation gas plant. Based upon Affiant's inspection of the aforesaid line and Affiant's engineering experience and training and based upon current costs of electric line construction, the total cost of such construction is estimated to be \$76,335.00. The actual route of the aforesaid line construction is shown in red on the map marked Exhibit 3 attached to the Affidavit of Marcie K. Scott and is also shown as a dotted line marked "Option 2" on the "Citation" map attached to the Affidavit of Marcie K. Scott as Exhibit 6 and a copy of which is attached to Affiant's affidavit.

8. Tri-County commenced serving the Citation office complex in December 1998 through a "point of delivery" comprised of a transformer and associated apparatus which did not exist and was not energized on March 18, 1968. At the time Tri-County made the connection of this new "point of delivery", Citation had, based upon Affiant's review of the "Citation" map attached hereto as Exhibit 6, an existing No. 4 CU three phase line immediately west of and adjacent to the office complex that was connected to the IP Texas substation through the same Citation distribution line at issue in this docket. Citation upgraded its No 4 CU three phase line

to a 2/0 ACSR three phase line as a part of the overall rebuild and construction of new distribution facilities by Citation to serve the gas plant facilities.

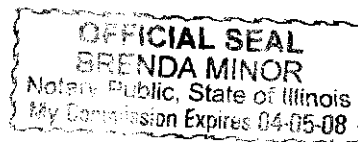
Further Affiant sayeth not.

Dennis Ivers
Dennis R. Ivers

Subscribed and Sworn to before me

this 27th day of March, 2008.

Brenda Minor
Notary Public





30C
Existing
(1) 35-4
(1) A5
(510) 1/0ACSR
(1) E3-10
(1) E1-3A
(1) F1-3S

30C

250 ft

1/0ACSR

Citation Oil Gas Plant
12-06 off E line pole 30
Estimate of cost

30B
Existing
(1) 35-4
(520) 1/0ACSR
Retired
(1) A1
Construction
(1) C7A-8
(520) 1/0ACSR
(1) E3-10
(1) E3-2A
(1) F7-2
(1) UM2-5-1
(1) M5-20
(3) UM3-1

255 ft

1/0ACSR

210 ft

1/0URD

30T

30T
Construction
(810) 1/0URD
(830) UP5A-3
(1) UM3-16
(3) UM3-1
(1) UG17

30A
Existing
(1) 35-4
(165) 1/0ACSR
Retired
(1) A6
(1) E3-10
(1) E1-3A
(1) F1-3S
Construction
(1) C7A-8
(165) 1/0ACSR
(1) E3-10
(1) E3-2A
(1) F7-2
(3) M5-20

30A

1/0ACSR
1/0ACSR

75 ft

1
Existing
(1) 40-4
(1) C1
(0) 336ACSR
Construction
(1) C7A-8
(3) M5-9

Iri-County Electric Co-op

Work Order Estimated Cost Report

Name: Citation est

Map Location: 15-06

Comment: Estimate 1 for short 3 phase to Citation office gas plant fed from E line.

Work Order Citation est 1

Date: Mar 20, 2008

Efficiency Multiplier: 0

UNIT	DESCRIPTION	QTY	Const Material	Material Total	Retire Material	Material Total	Install Labor	Install Total	Retire Labor	Retire Total
Add	UM2-5-1	UM2-5-1	1	\$745.12	\$745.12	\$0.00	\$0.00	\$1,837.20	\$1,837.20	\$0.00
Add	1/0URD	1/0URD	810	\$2.26	\$1,830.60	\$0.00	\$0.00	\$5.14	\$4,163.40	\$0.00
Add	C7A-8	C7A-8	3	\$321.63	\$964.89	\$0.00	\$0.00	\$673.64	\$2,020.92	\$0.00
Add	E3-10	E3-10	2	\$5.35	\$10.70	\$0.00	\$0.00	\$61.24	\$122.48	\$0.00
Add	E3-2A	E3-2A	2	\$139.74	\$279.48	\$0.00	\$0.00	\$183.72	\$367.44	\$0.00
Add	F7-2	F7-2	2	\$128.77	\$257.54	\$0.00	\$0.00	\$244.98	\$489.92	\$0.00
Add	M5-20	M5-20	4	\$30.25	\$121.00	\$0.00	\$0.00	\$122.48	\$489.92	\$0.00
Add	1/0ACSR	1/0ACSR	685	\$0.23	\$157.55	\$0.00	\$0.00	\$0.86	\$589.10	\$0.00
Add	UG17	UG17	1	\$279.62	\$279.62	\$0.00	\$0.00	\$1,224.80	\$1,224.80	\$0.00
Add	UM3-1	UM3-1	6	\$30.62	\$183.72	\$0.00	\$0.00	\$122.48	\$734.88	\$0.00
Add	UM3-16	UM3-16	1	\$0.00	\$0.00	\$0.00	\$0.00	\$1,469.76	\$1,469.76	\$0.00
Add	UR5A-3	UR5A-3	630	\$1.15	\$724.50	\$0.00	\$0.00	\$12.25	\$7,717.50	\$0.00
Add	M5-9	M5-9	3	\$76.04	\$228.12	\$0.00	\$0.00	\$122.48	\$367.44	\$0.00
Rem	F1-3S	F1-3S	1	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$122.48
Rem	A1	A1	1	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$122.48
Rem	A6	A6	1	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$244.96
Rem	E1-3A	E1-3A	1	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$122.48
Rem	E3-10	E3-10	1	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$61.24

UNIT	DESCRIPTION	QTY	Const Material	Material Total	Rewire Material	Material Total	Install Labor	Install Total	Retire Labor	Retire Total
	Material COST:	\$5,782.84								
	SUBTOTAL MATERIAL:	\$5,782.84								
	SUBTOTAL LABOR:	\$22,268.40								
	SUBTOTAL:	\$28,051.24								
	Efficiency Multiplier	\$0.00								
		Meters CT's:		\$0.00		OTHER COSTS:			\$0.00	
		Transformers:		\$0.00		OTHER COSTS:			\$0.00	
		TRANSPORTATION:		\$0.00		OTHER COSTS:			\$0.00	
						SUBTOTAL OTHER:			\$0.00	
						TOTAL ESTIMATED COST:	\$28,051.24			



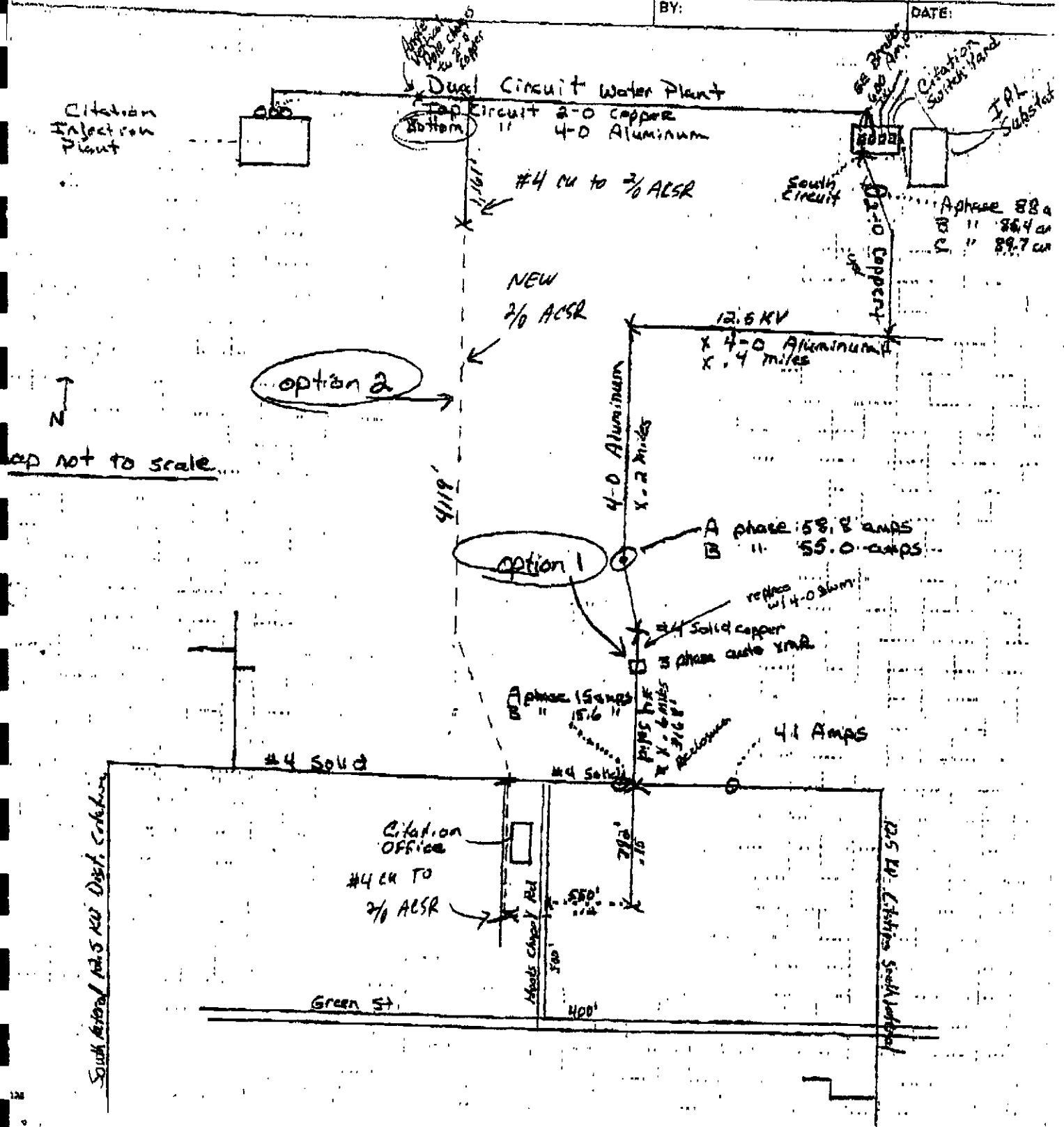
General Purpose Worksheet

SUBJECT: Salem Unit Line Distribution

FILE:

BY:

DATE:



Map not to scale